

# **EXHIBIT Q**

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALLEN M. MILLER, )  
)  
Plaintiff, )  
)  
vs. ) 3:17-CV-00408-MMD-WCG  
)  
C.H. ROBINSON WORLDWIDE, )  
INC., RONEL R. SINGH, )  
RHEAS TRANS, INC., and )  
KUWAR SINGH, d/b/a RT )  
SERVICE, )  
)  
Defendants. )

- - -

DEPOSITION OF STEVEN A. BELYUS

DATE: October 3, 2018 at 9:02 a.m.  
PLACE: Leizerman & Associates  
3450 W. Central Avenue  
Suite 328  
Toledo, Ohio 43606  
REPORTER: Maureen Powers, RPR  
Notary Public

- - -

1 correct?

2 A. That's correct. I don't know that they  
3 will allow me to.

4 Q. Your sole basis for your statement is  
5 from your experience as a highway patrol officer  
6 inspecting motor carriers and your work as your  
7 first entity, I'm sorry, is --

8 A. Traffic crash reconstruction, or BEL.

9 Q. BEL, thank you. And Stars Consulting,  
10 correct?

11 A. That's correct.

12 Q. The next statement says that Mr., the  
13 truck that Mr. Singh crashed was in OOS condition  
14 with two of the 10 brakes out of adjustment. You're  
15 getting that statement from the police report,  
16 correct, or the post-accident inspection?

17 A. That's correct.

18 Q. Again, you're not opining, you have not  
19 offered an opinion concerning the cause of the  
20 accident, correct?

21 A. I did not in the report, but I do have  
22 an opinion, that fatigue caused or contributed to  
23 the accident on the part of Mr. Singh.

24 Q. You have not offered an opinion

1 multiple losses of authority, even though it's  
2 through insurance. If I were in his position, I  
3 would fear that I would lose business because of  
4 these issues.

5 Q. But there is no indication in the record  
6 that he was losing business because of these issues.  
7 In fact, I think he testified he was operating for a  
8 number of brokers at the time, correct?

9 A. If he was operating in a financially  
10 fiscal method, then he shouldn't have been, he  
11 should have been able to afford insurance.

12 Q. Well --

13 A. Not have his authority continually  
14 revoked.

15 Q. He was able to afford insurance under RT  
16 Service, correct?

17 A. Yes. With a clean slate after he  
18 switched.

19 Q. Okay. He was able to pay for insurance  
20 when he started RT Service, yes?

21 A. Yes.

22 Q. Your next paragraph, "His complete  
23 disregard for hours of safety rules may have caused  
24 fatigue which contributed to this crash". This is

1 one of the only areas you talk about fatigue, as far  
2 as I recall, that's in your summary statement.

3 A. Yes, sir.

4 Q. Is there another area in your report  
5 where you discuss fatigue of the driver?

6 A. Fatigue is the sole reason for hours of  
7 service regulations, and innumerable scientific  
8 studies have been conducted on hours of service to  
9 regulate drivers against fatigue.

10 So the whole pre-'95 section is about  
11 driver fatigue. His failure to be in compliance  
12 with even telling the truth about what he was doing  
13 on his logbooks gives rise to the strong suspicion  
14 that he was working too much, too long, and drove  
15 into the median due to driver fatigue.

16 Q. One of your statements in your report is  
17 there's an inconsistency in statements concerning  
18 what Mr. Singh told the trooper at the time of the  
19 accident and what the logbook shows, correct?

20 A. Yes.

21 Q. And you previously said that Mr. Singh's  
22 testimony about the timing of when the accident  
23 occurred after he was struck by Mr. Miller could  
24 have been as a result of a state of shock or